REMARKS

Claims 16, 17, 19-21, 24, and 32-38 are pending. The Examiner's reconsideration of the rejections is respectfully requested in view of the remarks.

Applicants appreciate the Examiner's Response to Arguments. The following is provided in view of the Response to Arguments.

Claims 16, 17, 19-21, 32-36 and 38 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Troyansky et al. (US Application No. 2003/0190054) in view of Lewis (Lewis, R., "Adobde Pagemill 2.0 Handbook,") and further in view of Levy et al. (US Application No. 2003/0012548). The Examiner stated essentially that the combined teachings of Troyansky, Lewis and Levy teach or suggest all the limitations of Claims 16, 17, 19-21, 32-36 and 38.

Claim 16 claims, *inter alia*, "converting, automatically by the server, the textual content in text format to the textual content in the image format according to the content creation preference; storing the textual content in the image format; generating an HTML document containing an inline reference to the stored textual content in the image format for retrieval and dynamic assembly by the client; and replying to the request by serving the HTML document containing the inline reference to the stored textual content in the image format, wherein the reply does not include the textual content in the image format." Claim 35 claims, *inter alia*, "storing the textual content in the image format as a uniquely addressable element identified by a Uniform Resource Locator (URL); generating an HTML document containing an inline

reference comprising the URL to the stored textual content in the image format for retrieval and dynamic assembly by the client."

The Examiner suggests that "Pagemill teaches an Internet server receiving a request for a tagged HTML file. In response, the Internet server communicates the HTML file in textual format to a requesting client computer. The images are treated as text by the HTML format (page 12, parag.3-page 13, page 18-20). In other words the reply, which the server sends to the browser, only includes the html textual code, and not the watermarked image as recited in the independent claims 16, and 35."

Respectfully, even assuming the Examiner's suggestion is correct, the watermarked images are simply not the textual content in image format. That is the combination of references fails to teach a replacement of format that preserves the content. For example, in the application, FIG. 3 shows an example in which the word "first" is converted from textual format to image format, while the content, the usage of the word "first" is conserved. Compare Troyansky, which the rejection relies on for the teaching of a watermark; the watermark replaces first content with second different content. The watermark does not include the conversation of particular content from textual format to image format; note that the claims are specific that the content does not change with the conversation from a textual format to an image format. In view of the foregoing, consider the following:

Referring to Claim 16; Troyansky teaches a system and method for providing uniquely marked copies of data content via digital watermarks (see Abstract and paragraph [0124]). Troyansky further teaches a content processor that forms the sets of marked segments prior to distribution of the data content (see paragraph [0114]). The assembly of Troyansky is performed by a server (see for example, FIG 3). Further, the data stream with the embedded message is part

of the reply; compare Claim 16, wherein "the reply does not include the textual content in the image format." Therefore, Troyansky does not teach or suggest, "generating an HTML document containing an inline reference to the stored textual content in the image format", much less that "the reply does not include the textual content in the image format", essentially as claimed in Claim 16. Thus, Troyansky fails to teach or suggest all the limitations of Claim 16.

Lewis teaches that HTML tells a computer how to interpret hypertext documents (see page 13, second paragraph). Lewis does not teach or suggest, "generating an HTML document containing an inline reference to the stored textual content in the image format" as claimed in Claim 16. Lewis' PageMill generates HTML code, which may include <IMG> tags (see page 139, line 3). Lewis fails to teach or suggest how <IMG> tags are handled, more particularly Lewis fails to teach or suggest "an inline reference to the stored textual content in the image format" essentially as claimed.

The rejection requires that Lewis teach an Internet server receiving a request for a tagged HTML file, and in response, the Internet server communicates the HTML file in textual format to a requesting client computer, wherein the images are treated as text by the HTML form. Applicants note that Lewis states that "[b]ecause images are treated as text by HTML, you cannot precisely place a graphic on a page." Respectfully, Lewis is referring to image tags, e.g., the <IMG> tag that embeds an image in an HTML page. Thus, Lewis, in an attempt to simplify HTML to a rudimentary level, characterizes HTML in a way that is technically incorrect. That is, HTML treats images as text as stated by the Examiner only to the extent that an image can be referred to by a tag. Nothing in Lewis teaches or suggests that text is converted to an image format according to a content creation preference. Indeed, the claimed invention solves a problem identified by Lewis, more particularly, that one cannot "plan on using precise layouts of

text and graphics unless you place them as images from a page layout program." Since Lewis in no way teaches or suggests a page layout program executed on a server for dynamically creating images in response to a request, Lewis fails to teach or suggest all of the limitations of the claimed invention.

Therefore, Lewis fails to cure the deficiencies of Troyansky.

Levy teaches a method by which a server performs integration of a watermark in content (see paragraph [0093]). Levy does not teach or suggest, "generating an HTML document containing an inline reference to the stored textual content in the image format" as claimed in Claim 16. In Levy's method a client is a creator of content and watermarked content desiring to tailor audio or video content presented to consumers (see paragraphs [0078] and [0033]). This type of client is very different from the client of Claim 16 - the client of Claim 16 is a requestor of content from the server. Levy's client is a provider of content to the server. More particularly, Levy teaches that content, a watermark and watermark parameters are sent to a server for integration and returned as a complete document for later broadcast to consumers. Clearly then, this is not analogous to retrieval and inline dynamic assembly by the client, essentially as claimed in Claim 16 – Levy does not teach an inline reference. Moreover, the server of Levy returns content as a complete document for later broadcast to consumers - such a reply is clearly distinguishable from a "reply [that] does not include the textual content in the image format", essentially as claimed in Claim 16. Therefore, Levy fails to cure the deficiencies of Troyansky and Lewis.

The combined teachings of Troyansky, Lewis and Levy teach a server embedding content into data. Therefore, the combined teachings of Troyansky, Lewis and Levy fail to teach or suggest, "generating an HTML document containing an inline reference to the stored textual

content in the image format", nor a "reply [that] does not include the textual content in the image format" as claimed in Claim 16.

Referring to Claim 35; Claim 35 is believed to be allowable for at least the reasons given for Claim 16.

Further, the combined teachings of Troyansky, Lewis and Levy teach <IMG> tags referring to images in a file together with HTML code - such a tag does not a uniquely addressable element as claimed. The combined teachings of Troyansky, Lewis and Levy fail to teach or suggest, "storing the textual content in the image format as a uniquely addressable element identified by a Uniform Resource Locator (URL)" as claimed in Claim 35. The <IMG> tags of Troyansky, Lewis and Levy merely have directory addresses associated with the file. A file directory address is not analogous to the claimed URL, much less a URL created dynamically in response to a request, essentially as claimed.

Claims 17, 19-21 and 32-34 depend from Claim 16. Claims 36 and 38 depend from Claim 35. The dependent claims are believed to be allowable for at least the reasons given for Claims 16 and 35, respectively. Reconsideration of the rejection is respectfully requested.

Claims 24 and 37 have been rejected under 35 USC 103(a) as being unpatentable over Troyansky, Lewis, Levy and further in view of Minematsu (US 6,700,993). The Examiner stated essentially that the combined teachings of Troyansky, Lewis, Levy and Minematsu teach all the limitations of Claims 24 and 37.

Claim 24 depends from Claim 16. The dependent claims are believed to be allowable for at least the reasons given for Claim 16. Reconsideration of the rejection is respectfully requested.

For the forgoing reasons, the application, including Claims 16, 17, 19-21, 24, and 32-38, is believed to be in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,

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